

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
WEST VIRGINIA AT CLARKSBURG

UNITED STATES OF AMERICA,
Plaintiff,

v.

CRIMINAL ACTION NO. 1:22-CR-51-1

FOTIOS GEAS,
Defendant.

**MOTION FOR CO-DEFENDANT DECOLOGERO CHANGE OF PLEA AND
SENTENCING HEARING TRANSCRIPT**

Now comes the Defendant, Fotios Geas, through counsel, Patrick J. Burke, Nathan D. Chambers and Belinda A. Haynie, and respectfully moves this Honorable Court to order the preparation of co-defendant, Paul DeCologero's change of plea and sentencing hearing transcript.

Further, the undersigned requests that the court reporter be directed to provide a copy of the transcript to the undersigned counsel, without cost, due to the indigency of Mr. Geas. The undersigned does not request a transcript of any sealed proceedings, only the proceedings that were conducted in open court on August 1, 2024.

In support of this motion the undersigned states that Mr. Geas has been scheduled to appear for a combined change of plea and sentencing hearing on September 6, 2024. Mr. DeCologero's case is closely related to Mr. Geas' case. Thus, a review of the transcript of the DeCologero proceedings will assist undersigned counsel to adequately prepare Mr. Geas for the September 6, 2024, proceedings. If the Court determines to grant this motion, it is requested that

the court reporter be directed to provide the transcript to undersigned counsel no later than August 30, 2024 (one week before Mr. Geas' combined plea and sentencing hearing). A request has been submitted to EVoucher.

WHEREFORE, Mr. Geas respectfully requests that this Honorable Court grant this motion for Co-defendant, DeCologero's change of plea and sentencing hearing transcript.

Respectfully Submitted,

FOTIOS GEAS,
By Counsel,

/s/ Belinda A. Haynie
Local Counsel for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of August 2024, I presented the foregoing Motin for Co-Defendant, DeCologero's Change of Plea and Sentencing Hearing Transcript to the Clerk of Court for filing and uploading to the CM/ECF system, which will send notification of such filing to the following:

Brandon S. Flower
Assistant United States Attorney
Northern District of West Virginia

Randolph J. Bernard
Assistant United States Attorney
Northern District of West Virginia

And all counsel of record.

/s/ Belinda A. Haynie

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